

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:22-cv-21004-MD

JESSICA GUASTO,

Plaintiff,

vs.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality,

Defendant.

_____ /

EXHIBIT A

_____ Government x Plaintiff _____ Defendant _____ Court

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
1				R, UP	Steven Cosner Valentines Day Card to Plaintiff (D.E. 78-1)
2				R, UP	Steven Cosner Birthday Card to Plaintiff (D.E. 78-2)
3				R, H, I – Witness is Available, Non-Party Witness	Nicholas Guasto Declaration (D.E. 78-3)
4					Steven Cosner 12.28.2020 Email to Plaintiff (D.E. 78-4)
5					Plaintiff 12.28.2020 Email to Subordinate Officers (D.E. 78-5)
6					Steven Cosner Administrative Action Form (D.E. 78-6)

7					Miami Beach Police Department's Department Rules and Regulations in effect during December of 2020 (D.E. 78-7)
8				R, H, UP	Steven Cosner 1.8.21 Email to Michael Elkins (D.E. 78-8)
9				H	Steven Cosner 1.8.21 Email to A.J. Prieto (D.E. 78-9)
10					Defendant's Responses and Objections to Plaintiff's Request for Admissions
11				R, H	Defendant's Responses and Objections to Plaintiff's Second Request for Production of Documents
12				R, H	Defendant's Responses and Objections to Plaintiff's Third Request for Production of Documents
13					Defendant's Verified Answers and Objections to Plaintiff's Second Set of Interrogatories
14					Plaintiff's July 13, 2020 EEOC Charge of Discrimination (D.E. 71-3)
15					Richard Clements 1.25.2021 Memorandum to Plaintiff (Guasto 1st RFP Response Vol 1 pp. 12-13)
16				R	Miami Beach Police Internal Affairs Unit Officer Resume of Plaintiff (Guasto 1st RFP Response Vol. 1 pp. 341 – 343).
17					Plaintiff's Trackstar Activity Report 12.27.20 10:00:00 P.M. – 12.28.20 6:59:59 A.M. (Guasto 1st

					RFP Response Vol. 2 pp. 16 – 57)
18				R, H, UP, I- Settlement Negotiations	Clements 12.14.20 Email to Michael Smith (Guasto 1st RFP Response Vol. 2 p.70)
19				R, H, UP	Clements 1.26.21 Email to Michael Smith (Guasto 1st RFP Response Vol. 2 p. 85)
20					A.J. Prieto 1.25.21 Email to Clements, CC'd Michael Elkins (Guasto 1st RFP Response Vol. 2 p. 168)
21				R, H	Michael Elkins 1.4.21 Email to Clements (Guasto 1st RFP Response Vol 2 p. 196)
22				H, I – Witness is Available, Non-Party Witness	Deposition Transcript of Richard Clements (D.E. 69-16)
23				H, I – Witness Is Available, Non-Party Witness	Deposition Transcript of Paul Ozaeta (D.E. 69-23)
24				H, I – Witness Is Available, Non-Party Witness	Deposition Transcript of Reginald Lester (D.E. 69-24)
25				H, I – Witness Is Available, Non-Party Witness	Deposition Transcript of Steven Cosner (D.E. 69-6)
26					Plaintiff's 2020 W2 Form
27					Plaintiff's 2021 W-2 Form
28					Plaintiff's 2022 W-2 Form

29					Plaintiff's 2023 W-2 Form
30					Impeachment Exhibits
31					Any Exhibits Listed on Defendant's Exhibit List
32				R, H	WhatsApp Message Between Andrea Forero and Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on September 18, 2024, on all counsel of record on the service list below via e-email.

By: /s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

SERVICE LIST

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